

UNITED STATES DISTRICT COURT
 for the
District of Nebraska

United States of America)	Case No. 8:22MJ91
v.)	
Quincy Louis, D'Juan Beverly, Jr., Adrionna Leeper,)	
and Faye-Lynne Hardesty)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/24/22 through 3/1/22 in the county of Douglas, Sarpy, Lancaster in the District of Nebraska, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1951(a) and Section 2	Count 1 - Conspiracy to Commit Interference with Commerce by Robbery
18 USC 924(o) and Section 2	Count 2 - Firearms Conspiracy
18 USC 1951 and Section 2	Counts 3, 4, 6, 8, 10, 12, 14 Interference with Commerce by Robbery
18 USC 924(c) and Section 2	Counts 5, 7, 9, 11, 13 Brandishing a Firearm During and in Relation to a Crime of Violence
	Count 15 - Discharging a Firearm During and in Relation to a Crime of Violence

This criminal complaint is based on these facts:

See Attached Affidavit.

Continued on the attached sheet.



Complainant's signature

Jon P. Martin, TFO, FBI

Printed name and title

- Sworn to before me and signed in my presence.
- Sworn to before me by telephone or other reliable electronic means.

Date: 3/3/2022



Judge's signature

MICHAEL D. NELSON

Printed name and title

City and state: Omaha, Nebraska

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

DISTRICT OF NEBRASKA)
) ss. **Affidavit of TFO Jon Martin**
COUNTY OF DOUGLAS)

I, Jon Martin, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I am a Detective with the Omaha Police Department (OPD) and have been so employed for approximately twenty (23) years. I am currently assigned as a Task Force Officer (TFO) with the Great Plains Violent Crimes Task Force (GPVCTF), located at the FBI Omaha Division in Omaha, Nebraska. As a TFO, I have received training on a multitude of federal offenses at numerous law enforcement venues. I regularly refer to these laws and regulations during the course of my official duties. During my career as a Detective with the OPD and a TFO with the FBI Omaha Division GPVCTF, I have been the Case Agent and have assisted in robbery investigations which have resulted in search warrants, arrests, and the seizure and forfeiture of assets. Since I have been employed with the OPD, I have worked in the Uniform Patrol Bureau for approximately nine (9) years, and have since worked in the Criminal Investigation Bureau (CIB) where I specialized in robbery related offenses.

PURPOSE OF THIS AFFIDAVIT

This affidavit is submitted in support of a criminal complaint and arrest warrant for QUINCY LARUE LOUIS, JR (LOUIS), a male born in 1996, D'JUAN RAMEL BEVERLY, a male born in 1999, FAYE-LYNNE LEIGH HARDESTY (HARDESTY), a female born in 2002, and ADRIONNA LA'SHA LEEPER (LEEPER), a female born in 1999. Since this affidavit is

being submitted for the limited purpose of securing an arrest warrant for LOUIS, BEVERLY, HARDESTY, and LEEPER, I have not set forth each and every fact known to me regarding this investigation. The statements contained in this affidavit are based in part on the investigation that I have conducted and information provided to me by other law enforcement officers verbally, and through written reports.

OVERVIEW OF INVESTIGATION

RAPID ROBBERY SERIES

2. On Thursday, February 24, 2022 at 10:46PM Omaha Police Department Uniform Patrol (UPB) Officers responded to the Midwest Smoke Shop at 7010 Dodge Street #105, Omaha, Nebraska, in regards to a robbery. Witness and store employee stated that 4 parties were in the store and the employee initially thought they were customers. One of the suspects demanded money and a cell phone from the employee. The employee declined and grabbed a baseball bat in order to defend himself. The suspects left the store without any money from the store, but one of the suspects did take money from a "tip jar". The suspect who demanded money from the employee was described as a black male with a beard, wearing a blue bandana over the hairline, a dark jacket, gray sweatpants, and black and gray shoes. The other suspects were a black female, a black male, and a white female. This case was filed under Omaha Police Department RB# AR95498.

3. On Friday, February 25, 2022 at 6:31PM Omaha Police Department UPB Officers responded to the Family Dollar at 6618 North 30th Street, Omaha, Nebraska, in regards to a robbery. Witnesses and store employees advised a black male wearing a black hoodie, black pants, black shoes and a black ski mask came into the store with a handgun and demanded cash

from the register and safes. The suspect pointed the handgun at several people and even put it to the back of the store manager's head. The suspect then demanded the clerk put the money into a plastic bag from the store and then fled from the store northbound on foot. The suspect also demanded the employee remove the "traced money" from the bag prior to taking the money and fleeing. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95683.

4. On Friday, February 25, 2022 at 7:05PM Omaha Police UPB Officers responded to the Family Dollar at 2601 North 16th Street, Omaha, Nebraska in regards to a robbery. Witnesses advised a black male wearing a black hoodie, black pants, black shoes and a black ski mask came into the store with a handgun and demanded cash from the register. The suspect then had the clerk put the money into a bag from the store and fled southbound on foot. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95684.

5. On Friday, February 25, 2022 at 9:26PM Omaha Police UPB Officers responded to the Bucky's/ Casey's Gas Station at 2223 South 24th Street, Omaha, Nebraska in regards to a robbery. The clerk advised a black male wearing a brown hoodie jacket and a black ski mask came into the store with a handgun and demanded cash from the register. The suspect then demanded the clerk put the money into a bag and was last seen running eastbound from the store. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95705.

6. On Friday, February 25, 2022 at 10:01PM Omaha Police UPB Officers responded to the MegaSaver Gas Station at 10707 Blondo Street, Omaha, Nebraska in regards to a robbery. The clerk advised a black male, wearing a black hoodie, black pants and ski mask, entered the

store and demanded money from the register. The suspect then had the clerk put the money into a bag from the store and fled southbound on foot. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95711.

7. On Friday, February 25, 2022 at 10:37PM Omaha Police UPB Officers responded to the Casey's/ Bucky's Gas Station at 107 South 40th Street, Omaha, Nebraska, in regards to a robbery. The clerk advised a black male entered the store, showing a handgun, demanded money from the register and struck her in the head with the base plate of the firearm. The clerk was injured from this and received medical treatment for a cut to the right side of her head. The suspect demanded the money be put into a plastic store bag and was last seen running southbound from the store. The suspect was described as a thinner black male, wearing all black, a black ski mask with a surgical mask over the mouth. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95714.

8. On Saturday, February 26, 2022 at 11:58PM Omaha Police UPB Officers responded to the Valero Select Mart Gas Station at 2604 S 13th Street in regards to a robbery. The clerk advised a black male, wearing a black hoodie, pants and ski mask, armed with a black handgun, entered the store and threatened to shoot the employee. The suspect then demanded the clerk put the money from the cash register and safe into a plastic bag from the store along with NE Lottery Scratch tickets. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95933.

9. On Sunday, February 27, 2022 at 1:04AM Council Bluffs Police Officers were dispatched to Romantix at 3216 1st Avenue, Council Bluffs, Iowa in regards to a robbery. The suspect was described as a black male, wearing all dark clothing and a dark mask, armed with a

handgun. The suspect demanded money from the business, and upon receiving money the suspect fled the business. This case was filed under Council Bluffs Police Department Report number CB22-002136.

10. On Sunday, February 27, 2022 at 3:21AM Bellevue Police Officers were dispatched to the QuikTrip Gas Station at 1311 Fort Crook Road, Bellevue, Nebraska for an armed robbery. Upon arrival officers spoke to the clerk who advised a black male wearing all black clothing and a ski mask robbed the store at gunpoint, then fled southbound on foot. Video surveillance was recovered. This case was filed under Bellevue Police Department Report# 22-006229.

11. On Sunday, February 27, 2022 at 4:42AM Omaha Police UPB Officers responded to the QuikTrip Gas Station at 1704 S 72nd Street, Omaha, Nebraska in regards to a robbery. The clerk advised a black male wearing a black hoodie and ski mask entered the store, pointed a black handgun at her and demanded money from the register. The suspect had the clerk put the money into a store plastic bag and was last seen fleeing in a southwest direction from the store. Video surveillance was recovered. This case was filed under Omaha Police Department RB# AR95979.

12. On Monday, February 28, 2022 at 10:32PM Omaha Police UPB Officers responded to the Smoke and Vape at 4102 South 24th Street, Omaha, Nebraska in regards to an attempted robbery. The employee advised that an unknown black male wearing all dark clothing and a gray face mask came to the door and attempted to enter the business. The suspect was denied entrance to the business, as the suspect was seen carrying a handgun. The employee produced his own handgun and then the suspect fled the area. This case was documented under

Omaha Police Department RB# AR96377

13. On Tuesday March 1, 2022, at 2:59AM, Omaha Police UPB Officers were flagged down by a witness stating that the QuikTrip at 5005 South 108th Street, Omaha, Nebraska was being robbed by an unknown black male suspect. The employee later stated that a suspect entered the business, produced a handgun and demanded cash from the business. The suspect was provided cash and fled the scene. Officers arrived in the area of the QuikTrip and located a possible suspect vehicle. Officers attempted to stop the suspect vehicle, and the suspect vehicle began to flee. A vehicle pursuit of the suspect vehicle, a gray 2021 Nissan Versa with Florida License plate LHPG88, ensued and at one point an occupant of the suspect vehicle fired multiple gunshots at the pursuing Omaha Police Department Cruiser. The pursuit continued from Omaha into Sarpy County, Nebraska to 18607 South 138th Street, Springfield, Nebraska where the pursuit ended. At the conclusion of the pursuit, four suspects were taken into custody and later transported to Omaha Police Department Headquarters for interviews. The suspects were identified as QUNICY LOUIS, D'JUAN BEVERLY, ADRIONNA LEEPER, and FAYE-LYNNE HARDESTY. A black Glock43X firearm was recovered in the area that QUNICY LOUIS was located and taken into custody.

14. After the robbery of the QuikTrip on March 1, 2022, Omaha Police Department Officers learned of similar robberies that had occurred in Lincoln, Nebraska on March 1, 2022. During the three business robberies, it was learned the suspect description was similar to the description of the suspect in the QuikTrip robbery and also that during one of the robberies, a clerk from one of the businesses had been “pistol whipped” by the suspect. The locations of the robberies in Lincoln were 2710 W Street document under Lincoln Police Report Number C2-

016630, 4400 Cornhusker Highway documented under Lincoln Police Report Number C2-016623, and 3500 North 48th Street documented under Lincoln Police Report Number C2-016624.

15. All suspects were interviewed at Omaha Police Department Headquarters. After being advised of their Miranda Rights, all suspect agreed to speak with officers. All suspects gave admissions to being involved in and aware of the robberies in the robbery series. Suspect HARDESTY specifically admitted to being involved in the robbery series, identified LOUIS as the suspect who had gone into the businesses to rob them, identified BEVERLY as the getaway driver in the robberies, admitted to all the parties sharing in the proceeds from the robberies, that all four suspects chose which stores to rob and where to park the car during the robberies, that LOUIS had fired shots at the pursuing Omaha Police Officers and that LOUIS had asked them if he should shoot at the officers and force them to shoot him.

16. LOUIS was interviewed and admitted to committing the robberies in the series. LOUIS provided details of the robberies in Bellevue, Council Bluffs, Iowa, Lincoln, Omaha, and Ralston. LOUIS also admitted to firing shots at the pursuing officers. The corroborating details that LOUIS provided matched the robberies to include location, proceeds and method.

17. A review of reports and video surveillance led Omaha Police Department Detectives to believe all above incidents to be the same suspect. Detectives noted the black hoodie worn by the suspect in all robberies was black with white drawstrings. There were also similarities in the method used by the suspect when committing the robberies, the fact that a similar firearm was used and the similarity in types of businesses robbed by the suspect.

Based upon the above facts and circumstances, I believe sufficient probable cause exists to authorize a criminal complaint and arrest warrant for QUINCY LARUE LOUIS, JR (LOUIS), a male born in 1996, D'JUAN RAMEL BEVERLY, a male born in 1999, FAYE-LYNNE LEIGH HARDESTY (HARDESTY), a female born in 2002, and ADRIONNA LA'SHA LEEPER (LEEPER), a female born in 1999, regarding the violation of Conspiracy to Commit Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a), and Conspiracy to Use and Carry Firearms, during and in relation to crimes of violence, that is Robberies that Interfere with Interstate Commerce, in violation of Title 18, United States Code, Section 924(o), as well as Interference with Commerce by Robbery, in violation of Title 18, United States Code, Section 1951(a) and Using and Carrying Firearms, During and in Relation to Crimes of Violence, that is Interference with Commerce by Robbery, in violation of Title 18, United States Code, 924(c). Lastly, there is probable to believe that all of the described individuals aided and abetted each other in these crimes, in violation of Title 18, Section 2.



JON P. MARTIN, Task Force Officer
Omaha Police Department
Federal Bureau of Investigation

Sworn to before me by telephone or other reliable electronic means:

Date: March 3, 2022

City and State: Omaha, Nebraska



Michael D. Nelson, U.S. Magistrate Judge